

REMARKS

Applicant respectfully requests reconsideration for the present application based on the above claim amendments and the following remarks.

In the office action, the Examiner indicated that "Claims 1-3, 5, 8, 9-11, 13, 16-18" were rejected under 35 U.S.C. § 103(a) as being unpatentable over "Threadgill et al. (U.S. Patent Number 6,014,374)." Claims 6 and 12 were objected to as being dependent on a rejected base claim, but were indicated as being allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Applicant notes that the Examiner, in a telephone message on November 23, 2003, clarified that the reference applied to the claims was Threadgill et al. (U.S. Patent Number 6,272,341) rather than "Threadgill et al. (U.S. Patent Number 6,014,374)," as indicated in the office action. Applicant further notes that Applicant only submitted Claims 1-14 for examination as of the filing date of the present application. As such, the rejection of claims numbered higher than 14 (e.g., 16-18) seems to be improper. To expedite prosecution, Applicant will proceed on the assumption that the Examiner intended to reject Claims 1-5, 7-11, 13 and 14. If this assumption is incorrect, however, Applicant invites the examiner to contact the undersigned representative to clarify what was intended in the office action.

Allowable Subject Matter

In the office action, the Examiner indicated that Claims 6 and 12 were

objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. To expedite prosecution, Applicant has accordingly cancelled Claims 6 and 12 and re-presented those claims, including the limitations of their respective base claims and intervening claims, as new Claims 15 and 16.

Claims 1, 7 and 13

Applicant submits that Threadgill does not disclose, teach or suggest all of the features of Claims 1, 7 and 13. See MPEP § 2142 (*a prima facie* case of obviousness under 35 U.S.C. § 103(a) requires, among other things, that the cited references, when combined, teach or suggest every element of the claim). For example, Applicant submits that Threadgill fails to disclose, teach or suggest at least the following feature of amended Claims 1, 7 and 13: "receiving as input a Corsair Phoneprint data file including said call-specific data." Threadgill discloses a network engineering and systems engineering (NE/SE) support tool containing personal computers which receive disk-based files from a central server. (See Threadgill, col. 21, ln. 15-20.) Applicant submits that the disk-based files disclosed in Threadgill are not a "Corsair Phoneprint data file" recited in Claims 1, 7 and 13. Threadgill does not disclose any other attributes of its disk-based files. Thus, Applicant submits that Threadgill does not disclose, teach or suggest "receiving as input a Corsair Phoneprint data file," or using any data file "including said call specific data," as recited in Claims 1, 7 and 13.

Applicant further submits that Threadgill does not disclose, teach or suggest, among other things, "generating a graphical representation of said data file with said mapping software program," as recited in Claims 1, 7 and 13. Threadgill discloses graphical representations of satellite power allocation. (See Threadgill col. 28, ln. 24-27.) Applicant submits that making a graphical representation of the power allocation of a series of satellites is not "generating a graphical representation of said data file" where the data file is "a Corsair Phoneprint data file," as recited in Claims 1, 7 and 13.

Applicant submits that there is no suggestion or motivation in Threadgill to modify its teaching to arrive at the claims of the present application, at least for the reason that Threadgill attempts to solve a different problem. See MPEP § 2143.01 ("Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art.") Threadgill attempts to graphically represent the signal strength of a series of beams originating at a satellite, presumably to track satellite coverage and troubleshoot satellite coverage problems. (See Threadgill col. 28, ln. 24-27.) The claims of the present application recite, "receiving as input a Corsair Phoneprint data file including said call-specific data; feeding said data file to a thematic mapping software program; and generating a graphical representation of said data file with said mapping software program." Thus, because of the nature of the problem that Threadgill attempts to address, there is no

motivation to modify the teachings of Threadgill to produce the claims of the present application.

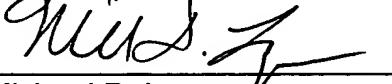
Claims 2-5, 8-11 and 14

Applicant respectfully traverses the rejections of Claims 2-5, 8-11 and 14. Applicant submits that Claims 2-5, 8-11 and 14 are allowable by virtue of their dependence from independent Claims 1, 7 and 13, as well as on their own merits.

SUMMARY

Applicant respectfully requests issuance of a notice of allowance for the pending claims in the present application. If the Examiner is of the opinion that the present application is in condition for disposition other than allowance, the Examiner is invited to contact the undersigned representative so that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,

  
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Michael D. Lazzara  
Registration No. 41,142  
Attorney for Applicant  
Customer No. 26285

Kirkpatrick & Lockhart LLP  
Henry W. Oliver Building  
535 Smithfield Street  
Pittsburgh, Pennsylvania 15222-2312  
Telephone: (412) 355-8994  
Facsimile: (412) 355-6501  
E-mail: [mlazzara@kl.com](mailto:mlazzara@kl.com)